

Memorandum

Approved For Release 2001/11/01 : CIA-RDP73-00099A000200020004-2

TO : ND

Date: January 9, 1969

FROM : NATR

In reply refer to:

SUBJECT: Proposed regulation on Microfilming

After looking at the proposed regulation and realizing the intended purpose I see no reason why it cannot be issued. Some editorial changes may be necessary other than those that have already been made.

If we wait until the USASI standards are approved and issued we will not be able to do anything for at least one year. We cannot reference the standards until they have been officially issued. If we use what is now proposed in the standards we would then have to take steps to get FSS to revise or amend Federal Standard No 125a. I do not feel that this is necessary or advisable at this time. I would prefer to wait until the USASI standards are official.

My comments on the changes required in the "draft regulation" are as follows:

101-11.503-3 beginning with sentence 5
2 square inches each from a
"clear area" rather than a
"representative image area", to the
General Services Administration _____

101-11.504

The glossary of photographic terminology defines "master" as the original from which reproductions are made. However, I believe it would be better to use the term "original negative" I suggest this section be rewritten as follows:

Original negative copies of permanent records shall not be used for reference purposes. Diazo or positive copies are to be used for these purposes. The original negatives are to be filed and stored as prescribed under section 101-11.505.
Whenever an agency finds _____



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101-11.505-1 I also question the last part of the last sentence under this section which reads "and shall not injure the film as a result of melting or distortion". I do not believe injury can be avoided under these circumstances. Suggest it be deleted.

101-11.505-3

Substitute "original negative" for the term "master".

Can we require this type of fire protection?
Are not fire-resistive vaults acceptable?
We do not use this type of protection for our film.

101-11.505-4 Environmental Conditions

Sentence 5 - revise to read "Film stored at a temperature lower than 70°F shall be sufficiently warmed _____".

101-11.505-5 Control of air conditioning

Sentence 5 - insert the word "storage" after the word "before" to read "Humidification before storage".

101-11.505-6 Protection against air-entrained impurities

If we refer to the NBS test method we should also be given the proper citation.

101-11.505-8 Microfilm inspection

We should also include a reference to NBS Handbook 96 entitled "Inspection of Processed Photographic Record Films for Aging Blemishes".

STATINTL

